

1 Honorable Tana Lin  
2  
3  
4  
5  
6  
7  
8

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 IN RE: PACIFIC MARKET INTERNATIONAL,  
10 LLC, STANLEY TUMBLER LITIGATION

11 NO. 2:24-cv-00191-TL  
12

This Document Relates to:  
13 All Actions

**ORDER GRANTING PLAINTIFFS  
FRANZETTI, KROHN, AND  
BARBU'S UNOPPOSED MOTION  
FOR APPOINTMENT OF  
INTERIM PUTATIVE CLASS  
COUNSEL**

14  
15 WHEREAS, this matter comes before the Court on the Motion for Appointment of  
16 Interim Putative Class Counsel filed on behalf of Plaintiffs Mariana Franzetti, Robin Krohn,  
17 and Laura Barbu. The Court being fully advised and for good cause shown, the Motion is  
18 hereby **GRANTED**.

19 **IT IS HEREBY ORDERED THAT:**

20 **A. Appointments to Interim Putative Class Counsel Leadership Structure.**

21 **1. Interim Co-Lead Counsel**

22 The Court appoints Alan M. Mansfield (Whatley Kallas LLP), Rebecca Peterson  
23 (Lockridge Grindal Nauen PLLP), and Ryan McCarl (Rushing McCarl LLP) as Interim Co-  
24 Lead Counsel for all plaintiffs in the above-referenced action (the “Consolidated Action”).

25 //

26 //

1 Interim Co-Lead Counsel will assume responsibility for the following duties during all phases  
2 of the Consolidated Action:

- 3
- 4 a) Coordinating the work of preparing and presenting all of plaintiffs' claims in  
5 the Consolidated Action and otherwise coordinating all pleadings and any  
responses thereto;
- 6 b) Assigning work responsibilities and monitoring the activities of all  
7 plaintiffs' counsel in the Consolidated Action in a manner to promote the  
orderly and efficient conduct of this litigation and to avoid unnecessary  
duplication and expense;
- 8 c) Calling meetings of counsel for plaintiffs in the Consolidated Action for any  
9 appropriate purpose, including coordinating responses and initiating  
10 proposals, suggestions, schedules, and any other appropriate matters;
- 11 d) Determining and presenting in briefs, oral argument, or such other fashion as  
12 their designee may deem appropriate to the Court and opposing parties the  
position of the plaintiffs in the Consolidated Action on all matters arising  
13 during pretrial and trial proceedings;
- 14 e) Serving as the primary contact for all communications between plaintiffs and  
15 defendant in the Consolidated Action, and acting as spokespersons for all  
16 plaintiffs *vis-à-vis* defendant and the Court;
- 17 f) Directing and executing on behalf of plaintiffs the filing of all documents  
18 with the Court in the Consolidated Action;
- 19 g) Appearing at all court hearings and conferences regarding the Consolidated  
20 Action, and speaking for plaintiffs in the Consolidated Action at all such  
hearings and conferences;
- 21 h) Initiating and conducting discussions and negotiations with counsel for  
22 defendant on all matters, including settlement, in the Consolidated Action;
- 23 i) Negotiating and entering into stipulations with opposing counsel as  
24 necessary for the conduct of the Consolidated Action;
- 25 j) Initiating, coordinating, and conducting all discovery on behalf of plaintiffs  
in the Consolidated Action;
- 26

- 1                   k) Selecting, consulting with, and employing experts for plaintiffs, as necessary  
2                   for the Consolidated Action;
- 3                   l) Assessing plaintiffs' counsel for the costs of the Consolidated Action and  
4                   establishing and coordinating the use of a litigation cost fund;
- 5                   m) Consulting with the Interim Executive Committee as determined to be  
6                   appropriate and as Interim Co-Lead Counsel shall direct;
- 7                   n) Preparing and distributing periodic status reports to the Court and to the  
8                   parties as ordered;
- 9                   o) Developing and recommending practices and procedures pertaining to  
10                  attorneys' fees and expenses and, on an ongoing basis, monitoring and  
11                  administering such procedures, and at such time as may be appropriate,  
12                  apportioning and allocating any fees and expenses that may be awarded by  
13                  the Court; and
- 14                  p) Performing such other duties as are necessary in connection with the  
15                  prosecution of this Consolidated Action or as may be further directed by the  
16                  Court in terms of organizing and supervising the efforts of plaintiffs' counsel  
17                  in a manner to ensure that plaintiffs' pretrial and trial preparation is  
18                  conducted effectively, efficiently, expeditiously, and economically.

15                  **2. Interim Executive Committee**

16                  The Court appoints as members of the Interim Executive Committee William Doyle (Doyle  
17                  APC), Lori Feldman (George Feldman McDonald, PLLC), and David Goodwin (Gustafson  
18                  Gluek PLLC) to work with Interim Co-Lead Counsel in this Consolidated Action.

- 19                  The Interim Executive Committee may assist Interim Co-Lead Counsel with:
- 20                  a) Preparing the consolidated class action complaint and any subsequent  
21                  amendments to the pleadings as may be necessary or ordered by the Court;
  - 22                  b) Developing and negotiating relevant discovery protocols and stipulations or  
23                  orders, drafting discovery requests to Defendant, and managing document  
24                  review;
  - 25                  c) Managing, implementing, and overseeing third party discovery;
  - 26                  d) Managing, implementing, and overseeing experts including interviewing  
27                  experts, preparing experts for and defending experts in depositions and any  
28                  reports required by the applicable Rules, and preparing for and taking  
29                  depositions of opposing counsel's experts;

- e) Researching legal issues, preparing motions, and responding to motions; and
  - f) All other responsibilities as may determined to be appropriate by Interim Co-Lead Counsel or as ordered by the Court and as Interim Co-Lead Counsel shall direct.

### **3. Interim Liaison Counsel**

The Court appoints as Interim Liaison Counsel Jason Dennett (Tousley Brain Stephens PLLC) and Brendan Donckers (Breskin Johnson & Townsend PLLC) and to act as an intermediary with the Court for receiving and initiating communications with the Court and the Clerk of the Court (including receiving orders, notices, correspondence, and telephone calls) and dispensing the content of such communications among plaintiffs' counsel in the Consolidated Action.

## B. Additional Matters

## 1. Settlement Discussions

Any discussions of a settlement of this litigation shall be conducted by Interim Co-Lead Counsel and/or any counsel designated by Interim Co-Lead Counsel.

## **2. Application of this Order**

This Order applies to all actions included in the above-captioned consolidated matters and all subsequently consolidated actions. Interim Co-Lead or Liaison Counsel must serve a copy of this Order promptly by overnight delivery service, electronic mail, or other expeditious electronic means on counsel for plaintiffs in each related action that is filed in, removed or transferred to this Court that is not yet consolidated in this proceeding as soon as practicable after counsel become aware of any such action(s).

## IT IS SO ORDERED.

DATED this 16th day of May, 2024.



Tana Lin  
United States District Court Judge